

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

V.I. DERIVATIVES, LLC, BY VIFX, LLC,	:	
Its TAX MATTERS PARTNER, by	:	CIVIL ACTION
RICHARD G. VENTO, its TAX MATTERS	:	
PARTNER	:	NO. 06-04

v.

DIRECTOR, VIRGIN ISLANDS BUREAU OF	:	
INTERNAL REVENUE	:	

VIFX, LLC, by RICHARD G. VENTO, its	:	
TAX MATTERS PARTNER	:	CIVIL ACTION

v.

DIRECTOR, VIRGIN ISLANDS BUREAU OF	:	
INTERNAL REVENUE	:	

ORDER

AND NOW, this 29th day of September, 2022, upon consideration of Respondent, Virgin Islands Bureau of Internal Revenue's Motions for Summary Judgment (Document Nos. 163 and 164) and the Respondents' Responses in Opposition thereto, it is hereby ORDERED that the Motions are GRANTED for the reasons outlined in the accompanying Memorandum, the determinations made by the Virgin Islands Bureau of Internal Revenue in the FPAAs issued to V.I. Derivatives, LLC and VIFX, LLC for the tax year ended December 31, 2001 are SUSTAINED IN FULL, and FINAL JUDGMENT is entered as a matter of law in favor of the Virgin Islands Bureau of Internal Revenue and against the Petitioners on the merits of the MLD transaction and as to the penalties imposed.

BY THE COURT:

/s/ Juan R. Sánchez

Juan R. Sánchez, J.